



## South Coast Air Quality Management District

### Engineering & Compliance

*Policies &  
Procedures*

#### SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

#### MEMORANDUM

**DATE:** November 24, 1986  
**TO:** Engineering Division Permit Processing Personnel  
**FROM:** Sanford M. Weiss, Director of Engineering /s/ SMW  
**SUBJECT:** Equivalency Plans and Operation Changes

Several of the District rules have provisions for meeting the rules' requirements by carrying out reductions on other equipment or processing lines (equivalency). There are two possible situations involving equivalency:

1. The applicant has a permit to operate, wishes to continue such operations, and has filed a plan to demonstrate and validate that the equivalent reductions have already taken place and show that the rule requirements are already satisfied with the existing permits (existing situation).
2. The applicant wishes to get new permits which will allow reductions at some equipment to balance higher emissions at the other equipment and thus achieve the requirements of the applicable rule (future situation).

With respect to the existing situation, it is likely that an applicant will be anxious to have your opinion and verbal okay with regard to whether the plan meets the rule requirements. As I have already told you, please do not issue any verbal approvals.

With respect to the future case, an operator may not change operations until you have issued new conditional permits for the operation of the equipment (refer to the attached memo)\*. Applicants asking about early changes should be told that filing applications for changes do not authorize such changes until new permits are issued. Such permit requests should be treated as applications for permits to construct in terms of priority for processing, but not as a P/C for actual processing (per my memo).

SMW:aa

cc: E. Camarena  
C. Coleman

\*cited memo is no longer available